

3. Accordingly, the EC files this motion to request an additional 30-days to complete fact witness depositions. If the Court grants this motion, the parties' new deadline to complete fact witness depositions will be March 4, 2024.

4. Pursuant to paragraph M of the Initial Case Management Order, the existing deadlines are as follows:

- a. A telephonic status conference will be held on January 10, 2024, at 8:30 a.m.
- b. The current deadline to depose all fact witnesses is February 2, 2024.
- c. The deadline to complete all written discovery is February 2, 2024.
- d. All discovery motions shall be filed by no later than February 2, 2024.
- e. The parties must submit a joint report confirming that the parties made a good faith attempt to resolve this case by February 16, 2024.
- f. The party bearing the burden of proof on an issue must identify and disclose all expert witnesses and expert reports on or before February 23, 2024.
- g. The party not bearing the burden of proof on the issue shall identify and disclose all expert witnesses and reports on or before March 29, 2024.
- h. Expert depositions shall be completed by April 26, 2024.
- i. Dispositive motions must be filed no later than June 7, 2024, with responses due within 28 days after the filing of the motion, and optional replies due within 14 days after the filing of the response.
- j. The jury trial is set for November 12, 2024.

5. Pursuant to paragraph M of the Initial Case Management Order, the requested extension will still conform to the requirements of Local Rule 16.01(h)(1) that no dispositive

motion deadline, including response and reply briefs, shall be later than 90 days in advance of the trial date.

CONCLUSION

For these reasons, the EC respectfully requests that the Court modify the Initial Case Management Order to permit the parties an additional 30-days to depose all fact witnesses. Counsel for the EC has conferred with all counsel of record who are unopposed to the requested relief.

Respectfully submitted,

s/ R. Brandon Bundren

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CERTIFICATE OF SERVICE

I certify that on January 5, 2024, I electronically filed a true and correct copy of The Executive Committee of the Southern Baptist Convention's Unopposed Motion to Modify the Initial Case Management Order with the Clerk of Court for the U.S. District Court Middle District of Tennessee through the Court's Electronic Case Filing System, which will automatically serve all counsel of record listed below:

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s/ R. Brandon Bundren

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